

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

IN RE NEW ENGLAND COMPOUNDING  
PHARMACY, INC. PRODUCTS  
LIABILITY LITIGATION

MDL No. 2419

Dkt. No. 1:13-md-2419 (FDS)

THIS DOCUMENT RELATES TO:

All Actions

**PLAINTIFFS' STEERING COMMITTEE'S  
ASSENTED TO MOTION FOR ENTRY OF DEPOSITION PROTOCOL**

Pursuant to the Court's Minute Entry of February 6, 2014 (Dkt. No. 862), the Plaintiffs' Steering Committee (the "PSC") previously moved the Court to enter a deposition protocol (Dkt. No. 876). Thereafter, the PSC conducted additional meet and confers with several defendants. As a result of those additional meet and confers, the PSC now revises its previous motion and requests that the Court enter the attached deposition protocol. Defendants Liberty Industries, Inc., ARL Bio Pharma, Inc., and UniFirst Corporation have assented to entry of the attached deposition protocol. Other Tennessee-related defendants have objected to the entry of the attached deposition protocol.<sup>1</sup> The PSC's attempts to meet and confer with all defendants on this deposition protocol is more fully explained in the contemporaneously filed Declaration of Benjamin A. Gastel.

Date: March 10, 2014

Respectfully submitted:

**/s/ J. Gerard Stranch, IV**

J. Gerard Stranch, IV

Benjamin A. Gastel

BRANSTETTER, STRANCH &

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<sup>1</sup> See Dkt. Nos. 981 and 983.

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*Plaintiffs' Steering Committee*

**CERTIFICATE OF SERVICE**

I, J. Gerard Stranch, IV, hereby certify that I caused a copy of the foregoing to be filed electronically via the Court's electronic filing system. Those attorneys who are registered with the Court's electronic filing system may access these filings through the Court's system, and notice of these filings will be sent to these parties by operation of the Court's electronic filing system.

Date: March 10, 2014

/s/J. Gerard Stranch, IV  
J. Gerard Stranch, IV